

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: May 4, 2023 at 1:00 p.m. (ET)
Objection Deadline: At or before the hearing

Ref. Nos. 1350 & 1355

NOTICE OF MOTION

TO: (a) the U.S. Trustee; (b) counsel to the Committee; (c) the Securities and Exchange Commission; (d) the Internal Revenue Service; (e) the United States Department of Justice; (f) the United States Attorney for the District of Delaware; (g) the Buyer; and (h) to the extent not listed herein, those parties requesting notice pursuant to Bankruptcy Rule 2002.

On April 25, 2023, FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) filed the *Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to File Certain Disclosure Schedules to the Interest Purchase Agreement Between Ledger Holdings Inc., M 7 Holdings, LLC and Miami International Holdings, Inc. Under Seal and (B) Granting Related Relief* (the “Motion”) [D.I. 1350] and the *Motion for Entry of an Order Shortening the Time for Notice of the Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to File Certain Disclosure Schedules to the Interest Purchase Agreement Between Ledger Holdings Inc., M 7 Holdings, LLC and Miami International Holdings, Inc. Under Seal and (B) Granting Related Relief* (the “Motion to Shorten”) [D.I. 1351]. A copy of the Motion and Motion to Shorten has previously been served upon you.

On April 26, 2023, the Court entered the *Order Granting Motion for Entry of an Order Shortening the Time for Notice of the Motion of Debtors for Entry of an Order (A) Authorizing the Debtors to File Certain Disclosure Schedules to the Interest Purchase Agreement Between Ledger Holdings Inc., M 7 Holdings, LLC and Miami International Holdings, Inc. Under Seal and (B) Granting Related Relief* [D.I. 1355].

Objections, if any, to the relief requested in the Motion must be filed with the United States Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, before or presented at the hearing on **May 4, 2023 at 1:00 p.m. (ET)**.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

A HEARING ON THE MOTION WILL BE HELD ON **MAY 4, 2023 AT 1:00 P.M. (ET)** BEFORE THE HONORABLE JOHN T. DORSEY, UNITED STATES BANKRUPTCY COURT JUDGE, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5th FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 26, 2023
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession